

1 ROBERT S. BREWER, JR.
United States Attorney
2 ERNEST CORDERO, JR
Assistant U. S. Attorney
3 California Bar No. 131865
MICHAEL A. GARABED
4 Assistant U.S. Attorney
California Bar No. 223511
5 United States Attorney's Office
880 Front Street, Room 6293
6 San Diego, CA 92101-8893
Telephone: (619) 546-7478/7703
7 Facsimile: (619) 546-7751
Email: ernest.cordero@usdoj.gov
8 Email: michael.garabed@usdoj.gov

9 Attorneys for Federal Defendants
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12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA

14 KAJI DOUSA,

15 Plaintiff,

16 v.

17 U.S. DEPARTMENT OF HOMELAND
SECURITY ("DHS"); U.S.
18 IMMIGRATION AND CUSTOMS
ENFORCEMENT ("ICE"); U.S.
19 CUSTOMS AND BORDER
PROTECTION ("CBP"); KEVIN K.
20 MCALEENAN, Acting Secretary of DHS;
MATTHEW T. ALBENCE, Acting
21 Director of ICE; MARK A. MORGAN,
Acting Commissioner of CBP; and PETER
22 FLORES, Director of Field Operations for
CBP, San Diego,

23 Defendants.
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Case No.: 19-cv-1255-LAB (KSC)

**DECLARATION OF SARO
OLIVERI**

1 I, Saro Oliveri, declare as follows:

2 I am the Customs and Border Protection ("CBP") Branch Chief at the Port of Otay
3 Mesa. I have held the position for ten years. I have personal knowledge of all facts contained
4 in this declaration. If called upon to do so, I could and would competently testify thereto.

5 1. As the Branch Chief, I am responsible for the Trusted Traveler Enrollment Center.
6 In this capacity, I have access to the Global Enrollment System ("GES") maintained by
7 CBP. The GES has been set up to maintain records and information on CBP's Trusted
8 Traveler Programs, including Global Entry and Secure Electronic Network for Travelers
9 Rapid Inspection ("SENTRI"). Through the GES, I can check on the history of a person's
10 enrollment in any of the Trusted Traveler Programs, including his or her current status.

11 2. In connection with the above-referenced lawsuit, I personally retrieved
12 information from the GES information pertaining to Kaji Dousa. The records indicate she
13 is enrolled in the Global Entry Program which allows expedited clearance for pre-approved,
14 low risk travelers upon their entry into the United States by land, air and sea. Each person
15 enrolled receives a "known traveler number" that can be used when making airline
16 reservations. CBP maintains a website where program members may login to check their
17 program status.

18 3. Global Entry and SENTRI are both Trusted Traveler Programs that provide some
19 overlapping benefits, but they also have differences. For example, both Global Entry and
20 SENTRI allow for expedited entry at land ports when crossing from Mexico and Canada.
21 However, Global Entry also can be linked to a passport for use when arriving by air. With
22 respect to someone returning to the United States from Mexico on foot or in an automobile,
23 Global Entry and SENTRI provide the same expedited clearance benefits.

24 4. Attached to this Declaration as Exhibit "A" is a true and correct copy of a record
25 I retrieved from the GES. The document has been redacted but contains information
26 showing that Kaji Dousa's Global Entry card was issued on December 14, 2016 and has
27 never been revoked or suspended. It currently is valid and expires on August 22, 2022.

1 5. I also retrieved information from CBP's ATS-L system to determine the dates Kaji
2 Dousa entered the United States over the past eighteen months. This information includes
3 the times she entered the United States through any Port of Entry on the U.S.-Mexico
4 border. Attached as Exhibit "B" to this declaration is a true and correct redacted copy of a
5 record from the ATS-L system indicating that she entered the United States at the San
6 Ysidro Port of Entry ("SYPOE") four times during the eighteen-month period. Three times,
7 she used her Global Entry card. Specifically, she used it when she crossed as a pedestrian
8 on (1) November 27, 2018; (2) January 2, 2019; and (3) April 4, 2019. She also crossed on
9 November 28, 2018, but this time she used her U.S. Passport.

10 6. The ATS-L records also indicate that Kaji Dousa was sent to the secondary
11 inspection area during only one of the four crossings at the SYPOE – on January 2, 2019.
12 That day, the time between her referral to the secondary inspection area at the SYPOE, and
13 her release by officers questioning her in secondary, was 43 minutes. Months later, on April
14 4, 2019, she again presented herself at the SYPOE using her Global Entry card. This time,
15 she crossed without referral to the secondary inspection area. I also note that on August 6,
16 2019, she left New York City on a flight to the Bahamas without incident.

17
18 I declare under penalty of perjury under the laws of the United States that the
19 foregoing is true and correct to the best of my knowledge. Executed on August 15, 2019 at
20 San Diego, California.

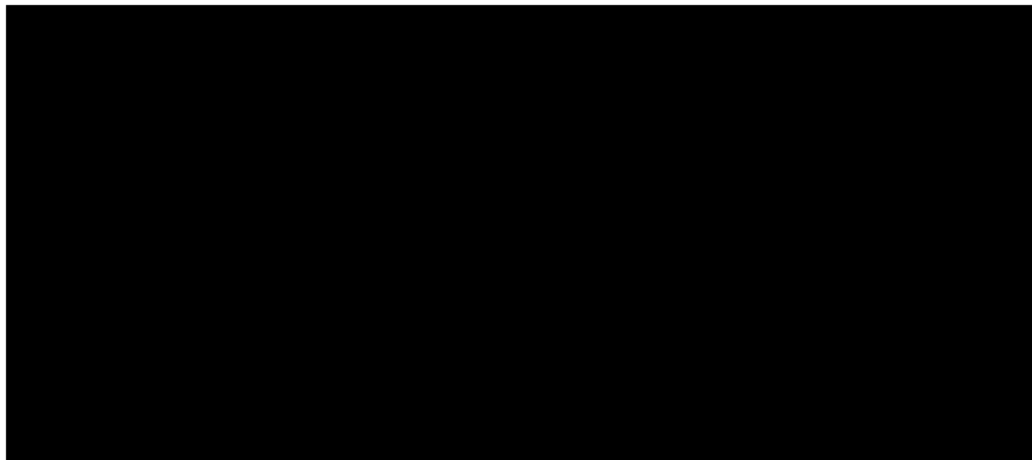
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Saro Oliveri

EXHIBIT

A



CTTP Card

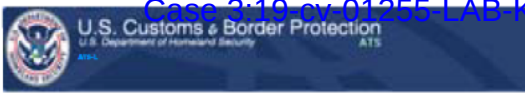


Status:	Activated	Last Name:	DOUSA
First Name:	KAJI ROSA SPELLMAN	Gender:	F
Birth Date:	[REDACTED]	Expiration Date:	22 AUG 2022
Citizenship:	USA	Application ID:	[REDACTED]
AIS Program:	GLOBAL ENTRY	Issue Date:	14 DEC 2016
Document Number:	[REDACTED]	Version:	C01
Issue RFID:	[REDACTED]	Suite:	
Tag ID:	[REDACTED]	State/Province:	CA
Street:	[REDACTED]	Postal Code:	919421701
City:	LA MESA		
Country:	US		



EXHIBIT

B



A S L Superquery

PERSON QUERY: DOUSA, KAJI DOB: [REDACTED]

Registrant Data:

Name	Birthdate	Address	City	State	Country	License Rbr	Record Last Updated
DOUSA, KAJI	[REDACTED]					0	

Person TICS Records

TICS Record ID	Status Code	Primary Action Code	Name	Middle Name	DOB	Entry Date/Time
[REDACTED]	[REDACTED]	[REDACTED]	DOUSA, KAJI	R	[REDACTED]	12/02/2018 15:05

NCIC Response - Request ID [REDACTED]

[REDACTED]

Comply	API	Barcode	Status	A S	RHT	DCL	Dir	Lane type	Plg ID	Vehicle	arm	Loc CD	Cross time	Cross Day	Cross Date	Doc type	CR	Doc ID	DOB	Name
	R	N				N		I	O				14:00	UESDA	06/06/19	P	US	[REDACTED]	[REDACTED]	DOUSA, KAJI ROSA SPELLMAN
	N		Adm1			N		P	I			S264	L2 E	020 28 08	HURSDA	04/04/19	SG	US	[REDACTED]	DOUSA, KAJI
	N		Refer		US Customs(C)	N		P	I			S264	L2 E	021 47 10	WEDNE DA	01/02/19	SG	US	[REDACTED]	DOUSA, KAJI
	N		Adm1	N		N		P	I			S237	L2 E	022 32 40	WEDNE DA	11/28/18	P	US	[REDACTED]	DOUSA, KAJI ROSA SPELLMAN
	N		Adm1			N		P	I			S259	L2 E	021 23 25	UESDA	11/27/18	SG	US	[REDACTED]	DOUSA, KAJI

Click on the magnifying glass next to the package ID to view the package images captured for the package. Images are only available for crossings up to a year from the date of the crossing.

Click here to view crossing history by date. No results found for the date range selected. No results found for the date range selected. No results found for the date range selected.

18 Month Crossing History Rollup

Loc CD	Location Name	King
CB - SAN YSIDRO WES (2504)		4

Click here to view the 18 month crossing history.

C

Name	DOB	Nationality	Birth Place	Passport Book ID	VISA Control Num	Site ID	Full List	US Valid FDN	Photo
[REDACTED]									

EED - Enforcement Integrated Database

Activity Date	Activity Type	Activity ID	Event Desc	Subject Data
[REDACTED]				

S/A/S

Incident Number	Port Code	Topic Line	Name	DOB	Seizure Date	Incident Date
[REDACTED]						

IOL

Incident Number	Port Code	Incident Type	Incident Date	Name	DOB	License Plate	License State
[REDACTED]	SAN YSIDRO (2504)	[REDACTED]	01/02/2019 00:15:00	DOUSA, KAJI	[REDACTED]		

Remarks: ON JANUARY 2, 2019 AT APPROXIMATELY 1847 HOURS, KAJI DOUSA (DOB: [REDACTED]) APPLIED FOR ENTRY INTO THE US FROM MEXICO VIA THE SAN YSIDRO PORT OF ENTRY PEDESTRIAN WEST AREA. DOUSA PRESENTED HER VALID GLOBAL ENTRY CARD BEARING #998027698. HER NAME AND PICTURE FOR ENTRY INTO THE UNITED STATES.

DEROGATORY INFORMATION WAS FOUND DURING INTERVIEW DOUSA WAS RELEASED AT APPROXIMATELY 1930 HOURS.

Conveyance	Passenger	DOB	Nationality	Date Ref'd	Time Ref'd	Site CD	Exit Chg	Location	Port CD	Doc ID
[REDACTED]										

Secondary Referrals - 1015

Passenger	DOB	Doc Ctry	Doc ID	Doc Type	Carrier	Flight #	Cross Date	Cross Time	Arrival Airport	Departure Airport	Inspection Results	Violation Code
[REDACTED]												

Secondary Referrals (2004)

Plate	Driver	DOB	Gender	Race	CRV	Date Ref'd	Referral RBR	Personal Search	POS/NEG	Loc Code	Loc Name	Port	Ref. #	IOI/SAS #
HP FOOT	KAJI DOUSA	[REDACTED]		S	W	01/02/2019 21:47	[REDACTED]	N	N	25E	CB - SAN YSIDRO WES	2504		

Remarks

ON JANUARY 2, 2019 AT APPROXIMATELY 1847 HOURS, KAJI DOUSA (DOB: [REDACTED]) APPLIED FOR ENTRY INTO THE US FROM MEXICO VIA THE SAN YSIDRO PORT OF ENTRY PEDESTRIAN WEST AREA. DOUSA PRESENTED HER VALID GLOBAL ENTRY CARD BEARING #998027698. HER NAME AND PICTURE FOR ENTRY INTO THE UNITED STATES.

NO DEROGATORY INFORMATION WAS FOUND DURING INTERVIEW DOUSA WAS RELEASED AT APPROXIMATELY 1930 HOURS.

184 Travel

Name	DOB	Citizenship	Admission RO	Admission Date	Arrival INS Port CD	Arrival INS Port Name	Passport
[REDACTED]							

Passenger	DOB	Carrier	Flight #	Departure Date	Departure Port	Arrival Date	Arrival Port	Photo
DOUSA, KAJI ROSA SPELLMAN	[REDACTED]	DE AIR INES, INC (D)	0000494	08/06/2019	New York Kennedy Intl national Apt (J K)	08/06/2019 02:00:00 pm	Newark Intl national Apt (NAG)	

Photo	Passenger ID	First Name	Last Name	DOB	Program	Program Status	Entry Inset Effective Date	Enrollment Expiration Date
	[REDACTED]	KAJI	DOUSA	[REDACTED]	Global Entry (G)	Approved (A)	12/14/2016	06/22/2022